

Denise Carlon, Esquire
Kevin G. McDonald, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 627-1322
Attorneys for RoundPoint Mortgage Servicing Corporation

IN THE MATTER OF:

Shirley Davis,

DEBTOR.

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 20-23744 RG

NOTICE OF OBJECTION

I, Denise Carlon, Esq., the undersigned, of KML Law Group, P.C., attorney for Secured Creditor **RoundPoint Mortgage Servicing Corporation**, the holder of a Mortgage on the debtors' premises at **15 Liberty St Newton, NJ 07860** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. The claims bar date is February 26, 2021. Secured Creditor intends to file a claim on or before the bar date.
2. Debtor is co-debtor on a loan that is secured by a lien on property located at 15 Liberty Street, Newton, NJ.
3. The other borrower is a Debtor in case # 20-22696-VFP. Neither Debtors' plan lists the pre-petition arrears.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/Denise Carlon, Esquire

Denise Carlon, Esquire
dcarlon@kmlawgroup.com
Attorney for RoundPoint Mortgage Servicing Corporation

Dated: January 18, 2021

